

VENTURA COUNTY COMMERCIAL
FISHERMEN'S ASSOCIATION
3600 So. Harbor Blvd
Oxnard, CA 93035

U.S. Fish and Wildlife Service
Ventura Field Office
Attn: Mr. Greg Sanders
2493 Portola Road, Suite B
Ventura, CA 93003-7726

September 29, 2000

RE: Notice of Intent to Prepare Supplemental to a Final Environmental Impact Statement
Pertaining to Translocation of Southern Sea Otters

Dear Mr. Sanders:

The Ventura County Commercial Fishermen's Association (VCCFA) appreciated the opportunity to comment on your Supplemental Environmental Impact Statement (SEIS).

Of the alternatives described in the Federal Register/Vol. 65, No. 145, July 27, 2000/Notices, VCCFA supports (1) The Action Alternative. VCCFA finds this alternative to be consistent with Public Law 99-625, which was negotiated by the U.S. Fish and Wildlife Service (USFWS), commercial and recreational fishermen of our region and members of the environmental community. The Action Alternative guarantees that fishermen and sea otters both co-exist. The Action Alternative also guarantees the public's access to local seafood products. These products support other local jobs, and important economic opportunities, taxes and exports which help our US. Balance of payments.

VCCFA recognizes that the USFWS has willfully neglected requirements of PL 99-625, Federal Rulemaking and Memorandum of Understanding with the California Department of Fish and Game (DFG) in regards to containment components of the sea otter translocation project and "no-otter/management-zone" since 1993. This willful neglect has cause significant loss of fishing opportunity to the membership of VCCFA, other local commercial fishermen and recreational fishermen.

SEIS RECOMMENDATIONS

VCCFA recommends that the SEIS included evaluation of the economic losses to our region (San Luis Obispo County, Santa Barbara County, Ventura County, Orange County and San Diego County) between 1993 and 2000.

VCCFA recommends the SEIS include an economic assessment of future economic impacts and/or lost fishing opportunity should sea otters continue to spread through-out the Southern California Bight in violation of PL 99-625.

U.S Fish and Wildlife Service
September 29, 2000
Pg. 2

VCCFA recommends a supplement to: Dobbins, James (1984) Compilation and Mapping of Available Biological, Ecological and Socio-Economic Information Bearing on the Protection, Management and Restoration of the Southern Sea Otter. U.S. Marine Mammal Commission, Contract No 14-16-0009-81-050. Dobbins evaluation of "suitable" and "un-suitable" habitats for sea otters concluded:

"Of all four zones, it appears San Nicolas Island may provide the least conflicts with shellfisheries considering simultaneous both existing commercial and sport fisheries. This is assuming that the animals will not disperse throughout the Channel Islands. Should dispersal take place to other island shelves such as the northern archipelago, (San Miguel, Santa Rosa, Santa Cruz, Anacapa) and Santa Barbara Island, conflicts arising from the selection of San Nicolas would be greater (in economic terms) than conflicts arising from dispersal from the other zones. Dispersal outside the other zones would also affect the magnitude of conflicts with existing commercial and sport fisheries."

(Executive Summary, pg. v)

The Dobbins study also identified pollution problems in Southern California as they related to "un-suitable" habitats for sea otters.